

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Josph G. Berry
Anne M. Berry

Debtor(s)

CHAPTER 13

PNC BANK, NATIONAL ASSOCIATION, its
successors and/or assigns

Movant

vs.

NO. 25-10627 AMC

Josph G. Berry
Anne M. Berry

Debtor(s)

Kenneth E. West

Trustee

PRAECIPE TO WITHDRAW

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly withdraw the Objection to Confirmation of PNC BANK, NATIONAL ASSOCIATION, which was filed with the Court on or about March 24, 2025.

Dated: June 23, 2025

Respectfully submitted,

/s/Matthew Fissel
Matthew Fissel, Esq.
KML Law Group, P.C.
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Philadelphia, PA 19106
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**PNC BANK, NATIONAL
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Chapter 13

CERTIFICATE OF SERVICE

I, Matthew Fissel, certify that on 6/23/2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Praeipce to Withdraw

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Dated: 6/23/2025

/s/ Matthew Fissel

Matthew Fissel, Esquire

Attorney I.D. 314567

KML Law Group, P.C.

BNY Mellon Independence Center

701 Market Street, Suite 5000

Philadelphia, PA 19106

201-549-2363

bkgroup@kmlawgroup.com

Name and Address of Party Served	Relationship of Party	Via
<p>Jospeh G. Berry 1494 Greenleaf Dr N Warrington, PA 18976</p> <p>Anne M. Berry 1494 Greenleaf Dr N Warrington, PA 18976</p>	Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>
<p>Michael Seth Schwartz Esq. 707 Lakeside Office Park Southampton, PA 18966</p>	Attorney for Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>
<p>Kenneth E. West Office of the Chapter 13 Standing Trustee 1234 Market Street - Suite 1813 Philadelphia, PA 19107</p>	Trustee	<p><input type="checkbox"/> Hand-delivered</p> <p><input type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>